

1 RENE L. VALLADARES  
2 Federal Public Defender  
3 Nevada State Bar No. 11479  
4 KATHRYN C. NEWMAN  
5 Assistant Federal Public Defender  
6 Nevada State Bar No. 13773  
7 411 E. Bonneville, Ste. 250  
8 Las Vegas, Nevada 89101  
9 (702) 388-6577/Phone  
10 (702) 388-6261/Fax  
11 Kathryn\_Newman@fd.org

12 Attorney for Janelle C. James

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 v.

18 JANELLE C. JAMES,

19 Defendant.

20 Case No. 2:20-cr-00218-RFB-EJY

21 **MOTION FOR LEAVE TO FILE**  
**MOTION UNDER SEAL**

22 Undersigned counsel is filing an Unopposed Emergency Motion to Modify  
23 Conditions of Pretrial Release. Defense counsel believes this information will  
24 assist the Court in evaluating the motion. Because this motion contains allegations  
25 of domestic violence by a third-party against Janelle James, it should be filed under  
26 seal and remain under seal. Undersigned counsel will serve the sealed motion on  
the government via electronic mail.

## CONCLUSION

For the foregoing reasons, undersigned counsel respectfully requests leave to file under seal Ms. James's Unopposed Emergency Motion to Modify Conditions of Pretrial Release, and requests that the Court maintain it under seal.

DATED this 8th of April, 2021.

Respectfully submitted,

RENE L. VALLADARES  
Federal Public Defender

By: /s/Kathryn C. Newman

KATHRYN C. NEWMAN  
Assistant Federal Public Defender  
Attorney for Janelle C. James

## ORDER

IT IS SO ORDERED.

8

RICHARD F. BOULWARE, II  
UNITED STATES DISTRICT JUDGE

DATED: April 8, 2021.

## CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that she is an employee of the Federal Public Defender for the District of Nevada and is a person of such age and discretion as to be competent to serve papers.

That on April 8, 2021, she served an electronic copy of the above and foregoing **MOTION FOR LEAVE TO FILE MOTION UNDER SEAL** by electronic service (ECF) to the person named below:

CHRISTOPHER CHIOU  
Acting United States Attorney  
ANDREW W. DUNCAN  
Assistant United States Attorney  
501 Las Vegas Blvd. South  
Suite 1100  
Las Vegas, NV 89101

/s/ *Marlene Mercado*  
Employee of the Federal Public  
Defender